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Attorneys for WAYMO LLC

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

vs.

UBER TECHNOLOGIES, INC.;  
OTTOMOTTO LLC; OTTO TRUCKING  
LLC,

Defendants.

CASE NO. 3:17-cv-00939-WHA

**DECLARATION OF FELIPE  
CORREDOR IN SUPPORT OF  
DEFENDANT OTTO TRUCKING'S  
ADMINISTRATIVE MOTION TO FILE  
UNDER SEAL PORTIONS OF ITS  
MOTION IN LIMINE TO EXCLUDE  
TESTIMONY OF DR. HESSELINK  
REGARDING PROTECTIONS OF  
WAYMO'S TRADE SECRETS**

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to  
3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,  
4 LLP, counsel for the Plaintiff Waymo LLC ("Waymo"). I have personal knowledge of the matters set  
5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Defendant Otto Trucking's Administrative Motion  
7 to File Under Seal Portions of Its Motion in Limine to Exclude Testimony of Dr. Hesselink Regarding  
8 Protections of Waymo's Alleged Trade Secrets ("Administrative Motion"). The Administrative  
9 Motion seeks an order sealing the highlighted portions of Otto Trucking's Motion in Limine to  
10 Exclude Testimony of Dr. Hesselink Regarding Protections of Waymo's Alleged Trade Secrets ("Otto  
11 Trucking's Motion") and of Exhibit 5 to the Vu Declaration, as well as the entirety of Exhibits 1-4, 6,  
12 and 7 thereto.

13 3. Otto Trucking's Motion and Exhibits 2-6 (green highlighted portions in versions filed  
14 herewith), as well as the entirety of Exhibits 1 and 7, contain, reference, and/or describe Waymo's  
15 highly confidential and sensitive business information. Such information includes details regarding  
16 Waymo's security measures and protocols and detailed computer forensics regarding access to  
17 Waymo's trade secrets. I understand that Waymo maintains this information as confidential. The  
18 public disclosure of this information would cause significant competitive harm to Waymo, as its  
19 security measures and computer forensics methods would become known to competitors who could  
20 use such information to Waymo's disadvantage.

21 4. Exhibits 4 and 5 also contain email addresses and/or phone numbers of Waymo  
22 employees and former employees involved in this case, the disclosure of which would cause Waymo  
23 and those employees substantial harm due to the high public profile of this litigation.

24 5. Exhibits 4 and 5 additionally contain highly sensitive information that Waymo seeks to  
25 seal. Specifically, those portions contain the domains that host Waymo's highly confidential SVN  
26 repository and other computer systems. Public disclosure of such information will give bad actors  
27 seeking to hack Waymo's databases a target to attack. Further, there is no public purpose served by  
28 disclosing the precise web or IP address at which the servers reside.

6. Waymo's request to seal is narrowly tailored to those portions of Otto Trucking's Motion and Exhibits 1-7 that merit sealing.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this declaration was executed in San Francisco, California, on September 20, 2017.

By /s/ *Felipe Corredor*

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Felipe Corredor

Attorneys for WAYMO LLC

**ATTESTATION**

In accordance with Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from Felipe Corredor.

By: /s/ Charles K. Verhoeven  
Charles K. Verhoeven